



April 9, 2019

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**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation, ET Docket No. 13-49, GN Docket  
No. 18-357

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 1.1206, the Association of Global Automakers, Inc. ("Global Automakers"), by its attorneys, hereby submits this letter summarizing an *ex parte* meeting in the above-referenced docket.

On April 5, 2019, Global Automakers' Charles Haake, Vice President and General Counsel; Hannah Izon, Senior Manager, Federal Government Affairs; Steve Gehring, Vice President, Vehicle Safety and Connected Automation; and Paul Scullion, Senior Manager, Vehicle Safety and Connected Automation; and counsel to Global Automakers Scott Delacourt of Wiley Rein LLP, met with Aaron Goldberger, Legal Advisor, Office of Chairman Ajit Pai.

The parties discussed the transformative potential of vehicle-to-everything ("V2X") technology. The parties discussed how V2X services will bring tremendous safety and other benefits to the nation's roadways. Global Automakers also explained that V2X services will advance progress toward higher levels of vehicle autonomy.

The parties discussed the importance of preserving the entire 5.9 GHz band—all seven channels—for V2X safety services. Global Automakers explained how the band is particularly well-suited for V2X services because it enables low-latency communications that can be propagated around obstructions. Global Automakers explained that reallocating this spectrum for other uses would risk squandering the transformational V2X opportunity.

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In addition, Global Automakers urged the Commission, should it proceed with a rulemaking regarding the future of the 5.9 GHz band, to ensure that the process be data-driven and observe certain key principles, including:

- Retaining the entire 5.9 GHz band for auto-safety services;
- Evaluating interoperability; evolution and backwards compatibility; and the potential coexistence of multiple V2X technologies in a technology-neutral and data-driven manner;
- Ensuring that any band plan that accommodates multiple technologies avoids harmful interference between V2X services or by unlicensed services sharing the band;
- Ensuring that all V2X-equipped vehicles and infrastructure can provide for communication of the Basic Safety Message; and
- Promoting investment in deployment of lifesaving V2X services for the benefit of the driving public.

Please direct any questions to the undersigned.

Respectfully Submitted,

*/s/ Scott Delacourt*

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